



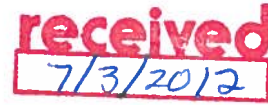
United States
Department of
Agriculture

Grain Inspection,
Packers and Stockyards
Administration

Technology and Science Division
10383 N. Ambassador Drive
Kansas City, MO 64153-1394

July 2, 2012

U.S. Environmental Protection Agency, Region VII
901 North 5th Street
Kansas City, Kansas 66101



ATTN: Dedriel Newsome
Environmental Engineer

Dear Ms. Newsome,

Enclosed is the response to the Notice of Violation Pursuant to Requirements of the Resource Conservation and Recovery Act (RCRA) and request for additional information regarding the audit on June 20, 2012 at the United States Department of Agriculture's Grain Inspection, Packers and Stockyards Administration's National Grain Center located at 10383 North Ambassador Drive in Kansas City, Missouri.

Please do not hesitate to contact for any further information you may need at matthew.c.jung@usda.gov, or at (816) 891-0467.

Sincerely,

Matthew Jung
Industrial Hygienist

Enclosures – Response and Attachments A-J

Cc: Mark Kemp, GIPSA Safety Officer
Mary Coffey Alonzo, Director, Technology and Science Division, GIPSA

AWMD / WEMM
JUL 12 2012
RECEIVED

RCRA



Response to U.S.E.P.A., Region VII Audit

(June 20, 2012)

of

U.S.D.A. Grain Inspection, Packers and Stockyards Administration

National Grain Center

10383 North Ambassador Drive

Kansas City, Missouri 64153

June 29, 2012

Citation 1: 40 CFR 262.11

Description: Make a hazardous waste determination on a) printer cartridges and b) Kimwipes

Corrective Action:

a) Personnel are active in recycling programs and as mentioned in the interview of Ms. Ruth Goff, all other printer cartridges in the facility are managed through various vendor return programs. The Epson printer cartridges identified as being managed as solid waste are listed in Attachment A. A review of the associated MSDS showed no hazardous constituents. However, they have already been incorporated into Staples and Office Max return programs as of the date of our Audit.

b) The specific instance of inquiry was for a test method in the Biotechnology lab involving the use of chloroform. Attachment B is the Work instruction for that method. Please note that Section 4 clearly delineates chloroform waste management as hazardous. During the interview of Mr. Paul Wacker, Section 6.18 instruction for the use of paper towels led to the question that chloroform might be present in the absorbents. After speaking with Dr. Ron Jenkins, and reviewing the extraction sequence, it was determined that chloroform is not present in the supernatant, and so it also is not present in the paper towels. Given this opportunity for review, all other labs were also asked to re-affirm their proper use and the potential need for hazardous disposal of laboratory absorbents.

Citation 2: 10 CSR 25-5.262(2)3.B

Description: Update notification

Corrective Action: Personnel changes led to the need to change contact information for hazardous waste management. Although a change was previously submitted in July of 2011, the information was apparently not recorded (Attachment C). I telephoned DNR on June 26, 2012 to inquire if the update had occurred, but they mentioned a back-log and suggested I either draft a letter stating the change or submitting a Form MO 780-1164. Please see Attachment D.

Citation 3: 40 CFR 265.173(a) and 10 CSR 25-5.262(2)(c)3

Description: Close 2 satellite accumulation containers (Lab 228 & 110) and date 3 containers (Lab 139)

Corrective Action: The 2 containers mentioned were immediately closed upon discovery. In addition, please see Attachment E for photographs of corrected containers in Lab 139.

Citation 4: 40 CFR 262.34(c)(1)

Description: 1 satellite accumulation not at point of generation – storage requirements (Lab 139)

Corrective Action: As mentioned in the Audit, the Flame AA instrument and its corresponding analytical functions were physically separated in construction phasing and as a result, the satellite waste accumulation was inadvertently also separated. In an effort to regain compliance, the waste containers depicted in Attachment E are now functioning as satellite accumulation containers.

Citation 5: 40 CFR 266.37

Description: Make arrangements with the police

Corrective Action: Also as a result of construction activity, police services which are normally provided by Federal Protective Services (FPS) have recently been suspended. Please see Attachment F for initial attempt to request local police services. Although a response is still pending, active attempts to contact Kansas City Police Department will continue. Construction is scheduled to be complete by the first part of September and the facility will revert to FPS coverage.

Citation 6: 40 CFR 262.34(d)(5)ii(A)+(B)

Description: Emergency info not posted near phone (names & equipment)

Corrective Action: Please see Attachment G for compliant posting and template.

Additional information requests:

Ignitable wastes <50 feet from property line – in reviewing a prior EPA inspection of this property, it was discovered that this question was formerly resolved via a Fire Marshall waiver (Attachment H).

Acid neutralization LDR to file – please see Attachment I.

Training records – please see Attachment J.

ATTACHMENT A

Epson 4800 cartridges

T6138

T6052

T605B

T6054

T6057

T6055

T605C

T6059

Epson 7600 cartridges

T5438

T5433

T5435

T5436

T5434

Epson R2000 cartridges

T1594

T1593

T1598

T1597

T1599

T1591

T1590

T1592

ATTACHMENT B

Work instruction: WI-516-0

FOR BIOTECHNOLOGY LABORATORY ON

**DNA EXTRACTION AND ISOLATION
- CTAB EXTRACTION**

APPROVED BY:
G. Ronald Jenkins, Biotechnology Program Leader

DATE

WINO.: WI-516-0		Page 2 of 5
TITLE: DNA Extraction and Isolation – CTAB Extraction		
Revision: 0	Replaces: None	Effective: 9/20/10
Reason for Revision:		
Author: Paul M. Wacker	Auditor:	Audit Date:

Table of contents

1.	Purpose and Scope of Work Instruction.....	3
2.	Operator’s Qualifications and Responsibilities	3
3.	References	3
4.	Safety Precautions.....	3
5.	Equipment and Materials.....	3
5.1b	Terms and Definitions.....	4
6.0	Procedures	4

WINO.: WI-516-0		Page 3 of 5
TITLE: DNA Extraction and Isolation – CTAB Extraction		
Revision: 0	Replaces: None	Effective: 9/20/10
Reason for Revision:		
Author: Paul M. Wacker	Auditor:	Audit Date:

1. Purpose and Scope of Application

This work process is a procedure for DNA extraction from grains using CTAB.

2. Analyst Qualifications and Responsibilities

The analyst(s) will receive proper training in the conduct of this procedure and will follow the procedure as written. The Supervisory Chemist is responsible for ensuring this procedure is followed and modified as necessary or appropriate. The Biotechnology Supervisor must approve all revisions to this procedure prior to implementation.

3. References

4. Safety Precautions

Refer to the Technical Services Division Chemical Hygiene Plan.

- To prevent skin contact when working with liquid solutions, wear protective gloves. Chemical goggles and a lab coat are available if desired.
- Change gloves frequently.
- This process involves the use of chloroform. All use of chloroform must be performed under a fume hood. Dispose of chloroform and chloroform extracts as hazardous waste.

5. Equipment and Materials

Sterile water (autoclaved Nanopure water)
 CTAB Buffer
 RNase A
 Proteinase K
 Chloroform/isoamyl alcohol
 0.5 X TE
 CTAB Precipitation solution
 2.4M NaCl solution
 Absolute Ethanol (cold)
 70% Ethanol (cold)
 15 ml Falcon Tubes
 2 ml Eppendorf tubes
 Tube racks
 Micro-pipettors and pipet tips
 Vortex shaker
 Centrifuge
 65°C and 37°C incubation baths

WINO.: WI-516-0		Page 4 of 5
TITLE: DNA Extraction and Isolation – CTAB Extraction		
Revision: 0	Replaces: None	Effective: 9/20/10
Reason for Revision:		
Author: Paul M. Wacker	Auditor:	Audit Date:

Serological pipets
Pipet pump
Vacuum Microfuge

5.1b Terms and Definitions

CTAB: Hexadecyl(Cetyl)trimethylammonium Bromide - a surfactant (soap) and antiseptic that serves as a buffer solution. CTAB serves to break down cellular components of the ground grain.

DNA: Deoxyribonucleic Acid - a Nucleic Acid that carries the genetic information in a cell. In this usage, the DNA is extracted for further analyses of occurrence of genetic modifications attached to the DNA strand.

Vortexing: mixing of a sample by the use of a small vibratory mixer. Placing a sample tube on the mixer will result in rotational spinning, or vortexing, of the sample. This is an adequate method of mixing samples.

0.5 X TE: Tris- EDTA (Tris(hydroxymethyl)aminomethane 10:1 with Ethylenediaminetetraacetic acid) is 100 X. Dilute to 0.5 X with sterile water. Tris is a buffer that inhibits enzyme action. EDTA is a chelating agent that will bond with any metals (magnesium or calcium) in solution.

6. Procedures

Note: Never vortex genomic DNA. Vortexing of genomic DNA can result in degradation (shearing) of the DNA. Store the DNA at -4°C and -20°C for short and long-term storage, respectively. The DNA will degrade by repetitive thawing and freezing.

The weights listed in this procedure are for use with 1 gram of ground grain flour. Multiply or divide the amounts of additives if using another weight of ground grain, until re-suspension (step 18).

1. Put on gloves. Transfer 1.00 g of ground grain into a labeled 15 ml Falcon tube.
2. Add 3 ml of sterile water
3. Add 7 ml of CTAB-Buffer; mix by vortexing or by vigorous shaking.
4. Using a micro-pipet, add 50 µl of RNase A solution. Vortex the RNase A before pipetting. Mix for 30 seconds. The RNase A is stored in the -25°C cooler. Label the date opened if using a new solution.
5. Incubate at 65°C for 30 minutes.
6. Using a micro-pipet, add 200µl of Proteinase K. Vortex the Proteinase K before pipetting. Proteinase K is kept in the Hobart cooler. Label as above.
7. Incubate at 37°C for 15 minutes.
8. Cap the Falcon tubes tightly. Centrifuge to separate grain to bottom of tube (10 min @ 3.7K rpm).

WINO.: WI-516-0		Page 5 of 5
TITLE: DNA Extraction and Isolation – CTAB Extraction		
Revision: 0	Replaces: None	Effective: 9/20/10
Reason for Revision:		
Author: Paul M. Wacker	Auditor:	Audit Date:

9. While the centrifuge is running, set up and label two sets of 15 ml Falcon tubes. Load one set of tubes with 5 ml of chloroform/isoamyl alcohol. Use a seriological pipet with the pipet pump to load the Falcon tubes with chloroform/isoamyl alcohol. The serological pipets will dissolve quickly. Replace the pipet if degraded beyond use.
10. Transfer supernatant to the 15 ml Falcon tube containing 5 ml of chloroform/isoamyl alcohol; cap tightly and shake the solution for 30 seconds.
11. Centrifuge to separate layers (2 minutes @ 3.7K rpm)
12. Load the second set of Falcon tubes with 7 ml of chloroform/ isoamyl alcohol while the centrifuge is running.
13. Using a serological pipet connected to a pipet pump, transfer 7 ml of the upper aqueous layer to the 15 ml Falcon tube containing 7 ml of chloroform/isoamyl alcohol. Use a fresh pipet for each transfer. Cap and shake the solution for 30 seconds.
14. Centrifuge to separate layers (2 minutes @ 3.7K rpm)
15. Transfer 6 ml of the upper aqueous layer to a new 15 ml Falcon tube.
16. Make two additions of 6 ml CTAB Precipitation solution (2X volume). Mix with pipet tip after the second addition.
17. Incubate overnight at room temperature.
18. Centrifuge for 5 min @ 3.7K rpm. Look for pellet; discard supernatant. Take care not to lose the pellet. Use a micro-pipet to remove the supernatant if necessary. (Pouring the last of the supernatant onto a brown paper towel will allow you to notice the pellet if it flows out.)
19. Add 175 µl of 0.5X TE to re-suspend the pellet.
20. Transfer to a 2 ml Eppendorf tube; add 5.0 µl RNase A solution. Vortex the solution. Incubate at 37°C for 60 minutes.
21. Add 175 µl 2.4M NaCl solution, mix by inversion. Add 350 µl chloroform, shake 30 seconds.
22. Centrifuge to separate (2 minutes @ 13K rpm).
23. Using a micro-pipet, transfer the upper aqueous solution (~ 300 µl) to a new 2 ml Eppendorf tube. Take care not to transfer the interface. Add twice volume cold absolute ethanol. Mix by inversion. Precipitate at -20°C overnight.
24. Centrifuge for 10 minutes @ 13K rpm. Gently pour off supernatant. Take care not to lose pellet.
25. Wash with 500 µl cold 70% ethanol (shake carefully).
26. Centrifuge for 10 minutes @ 13K rpm. Gently pour off supernatant. Take care not to lose pellet. Dry 30 minutes in a vacuum microfuge. When dry, there should be strands of DNA in the tubes.
27. Re-dissolve the DNA pellet in 100 µl of 0.5X TE (may be preheated at 65°C to facilitate re-suspension.)

Upon completion of this work process you should: successfully extract DNA from ground grain samples.

ATTACHMENT C



MISSOURI DEPARTMENT OF NATURAL RESOURCES
HAZARDOUS WASTE PROGRAM
PO BOX 178
JEFFERSON CITY, MISSOURI 65102
(573) 751-3176

GENERATOR'S HAZARDOUS WASTE
SUMMARY REPORT - PART I

GENERATOR NAME		
USDA GIPSA TSD		
CONTACT PERSON NAME		
Mathew Jung		
SITE STREET ADDRESS (DO NOT ENTER PO BOX NUMBER)		
10383 N. Ambassador Drive		
CITY	STATE	ZIP
Kansas City	MO	64153
GENERATOR EPA ID NUMBER		MISSOURI ID NUMBER
MOD985796762		014695
NOTE: THE FEDERAL EPA ID AND MISSOURI GENERATOR ID NUMBERS ARE ASSIGNED EXCLUSIVELY TO THE SITE WHERE WASTE IS PRODUCED. YOU MUST NOTIFY THE DEPARTMENT IF THE ADDRESS FOR THE SITE OF GENERATION CHANGES.		

NOTE: PLEASE READ INSTRUCTIONS AND EITHER PRINT OR TYPE

SECTION A - REPORT IDENTIFICATION (Complete Item 1 or Item 2, NOT BOTH)

1. ANNUAL		2. QUARTERLY FOR THE PERIOD ENDING		3
From 7/1	2010	To 6/30	2011	PAGE 1 of
(YYY)		(YYY)		8
<input type="radio"/> 8-30-YYYY		<input type="radio"/> 12-31-YYYY		
<input type="radio"/> 3-31-YYYY		<input checked="" type="radio"/> 6-30-YYYY		

SECTION B - GENERATOR IDENTIFICATION CHANGES

4. GENERATOR NAME	<input type="checkbox"/> CHANGED		
5. CONTACT PERSON	<input checked="" type="checkbox"/> CHANGED		
Mathew Jung	TELEPHONE NUMBER		
	816-891-0467		
6. MAILING ADDRESS	<input type="checkbox"/> CHANGED		
CITY	STATE	ZIP	
7. PLANT SITE ADDRESS	CITY	STATE	ZIP
8. NAME OF PARENT FIRM	<input type="checkbox"/> CHANGED		

SECTION C - STATUS OF WASTE GENERATED

9. NUMBER OF SHIPMENTS MADE. Enter the number of shipments made this reporting period. If greater than 0, complete Part II, sign certification, and transmit to the Department. If zero, check Item 10 or Item 11, whichever is appropriate.	10. REPORTABLE QUANTITY NOT GENERATED. Sign certification and transmit to the Department. (Do not complete Part II)	11. REPORTABLE QUANTITY GENERATED BUT NOT SHIPPED OFF-SITE THIS QUARTER. Sign certification and transmit to the Department. (Do not complete Part II)
4	<input type="checkbox"/>	<input type="checkbox"/>

SECTION D - COMMENTS

10.

SECTION E - CERTIFICATION STATEMENT

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

PRINT NAME	SIGNATURE OR AUTHORIZED PIN	DATE
MATTHEW C. JUNG		7/5/2011

ATTACHMENT D



MISSOURI DEPARTMENT OF NATURAL RESOURCES HAZARDOUS WASTE PROGRAM NOTIFICATION OF REGULATED WASTE ACTIVITY

All new and reactivating registrations require a \$100 initial fee. Registrations without this fee will not be processed. The fee is not required if only updating information to an existing and active registration. Form must be completed in its entirety, or it will be returned. Instructions are at the end of this form. Completed form should be sent to

Hazardous Waste Program or Hazardous Waste Program
P.O. Box 176 1730 East Elm Street
Jefferson City, MO 65102 - 0176 Jefferson City, MO 65101-4130
573-751-3176

I. TYPE OF NOTIFICATION

☐ A. NEW NOTIFICATION

EPA ID NUMBER
MOD985796762

☒ B. SUBSEQUENT NOTIFICATION

MISSOURI ID NUMBER
014695

II. NAME OF INSTALLATION (BUSINESS NAME, SITE NAME OR D.B.A.)

USDA GIPSA TSD

III. LOCATION OF INSTALLATION (PHYSICAL ADDRESS)

STREET
10383 North Ambassador Drive

CITY
Kansas City

STATE
MO

ZIP CODE + 4
64153-1377

COUNTY NAME
Platte

IV. INSTALLATION MAILING ADDRESS

STREET

CITY

STATE

ZIP CODE + 4

A. Billing Address (Fill this section out for a separate billing address. If left blank, fee invoices will be sent to mailing address)

STREET

CITY

STATE

ZIP CODE + 4

V. INSTALLATION CONTACT

FIRST NAME

Matthew

LAST NAME

Jung

TITLE

Industrial Hygienist

E-MAIL ADDRESS

matthew.c.jung@usda.gov

TELEPHONE NUMBER WITH AREA CODE

816-891-0467

EXTENSION

VI. OWNERSHIP

Note: Make copies of this section for multiple ownership.

A. NAME OF INSTALLATION'S LEGAL OWNER

USDA GIPSA

STREET, P.O. BOX OR ROUTE NUMBER

10383 North Ambassador Drive

CITY

Kansas City

STATE
MO

ZIP CODE + 4
64153-1377

TELEPHONE NUMBER WITH AREA CODE
816-891-0401

EXTENSION

E. CHANGE OF INSTALLATION OWNER INDICATOR
☐ YES ☒ NO DATE OF CHANGE:

C. INSTALLATION OWNER TYPE - MARK ONE

☐ PRIVATE ☐ COUNTY ☐ DISTRICT ☒ FEDERAL ☐ TRIBAL ☐ MUNICIPAL ☐ STATE ☐ HOSPITAL ☐ OTHER

D. NAME OF PROPERTY'S LEGAL OWNER

Elman Investors Inc.

STREET, P.O. BOX OR ROUTE NUMBER

450 Park Avenue Suite 2704

CITY

New York

STATE
NY

ZIP CODE + 4
10022

TELEPHONE NUMBER WITH AREA CODE
212-838-2700

EXTENSION

E. CHANGE OF PROPERTY OWNER
☐ YES ☒ NO DATE OF CHANGE:

F. PROPERTY OWNER TYPE (MARK ONE)

☒ PRIVATE ☐ COUNTY ☐ DISTRICT ☐ FEDERAL ☐ TRIBAL ☐ MUNICIPAL ☐ STATE ☐ HOSPITAL ☐ OTHER

MO 780-1164 (12-11)

VII. TYPE OF REGULATED WASTE ACTIVITY (ONLY MARK THE FOLLOWING SECTIONS THAT APPLY)

A. Hazardous Waste Activities

1. Generator of hazardous waste (Choose only one of the following four categories.)

- ☐ a. LQG: Greater than 1,000kg (2,220 lbs.) of non-acute hazardous waste or 1kg (2.2 lbs.) of acute hazardous waste in a calendar month.
- ☒ b. SQG: Generate 100 to 1,000kg (220-2,220 lbs.) of non-acute hazardous waste at any one time.
- ☐ c. CESQG: Generate less than 100kg (220 lbs.) of hazardous waste in a calendar month and never accumulate 100kg (220 lbs.) or more of hazardous waste at any one time.
- ☐ d. Not a generator. Generate no hazardous waste at any time.

In addition, indicate other generator activities.

- ☐ e. United States Importer of hazardous waste.
- ☐ f. Mixed waste (hazardous and radioactive) generator.

For Items 2 through 5, check all boxes that apply.

- ☐ 2. Transporter of hazardous waste.
- ☐ a. Transporter.
- ☐ b. Transfer Facility (at your site).
- ☐ 3. Treater, storer or disposer of hazardous waste (at your site).
- Note: A hazardous waste permit is required for this activity.
- ☐ 4. Recycler of hazardous waste (at your site).
- Note: A hazardous waste permit may be required for this activity.
- ☐ 5. Exempt boiler or Industrial furnace.
- ☐ a. Small quantity on-site burner exemption.
- ☐ b. Smelting, melting and refining furnace exemption.
- ☐ 6. Underground injection control.
- ☐ 7. Receives hazardous waste from off-site.

B. Universal Waste Activities

1. Large quantity handler of universal waste (accumulate 5,000kg or more). [Refer to Missouri regulations to determine what is regulated.] Indicate types of universal waste managed or accumulated at your site. Check all boxes that apply.

MANAGE

- a. Batteries ☐
- b. Lamps ☐
- c. Pesticides ☐
- d. Thermostats ☐

☐ 2. Destination facility for universal waste. Note: A hazardous waste permit may be required for this activity.

C. Used Oil Activities (Check all boxes that apply)

1. Used oil transporter - Indicate type(s) of activity(ies).

- ☐ a. Transporter
- ☐ b. Transfer facility

2. Used oil processor or re-refiner - Indicate type(s) of activity(ies).

- ☐ a. Processor
- ☐ b. Re-refiner

3. ☐ Off-specification used oil burner

4. Used oil fuel marketer - Indicate type(s) of activity(ies).

- ☐ a. Marketer who directs shipment of off-specification used oil to off-specification used oil burner.
- ☐ b. Marketer who first claims the used oil meets the specifications.

VIII. DESCRIPTION OF REGULATED WASTE ACTIVITY (USE ADDITIONAL SHEETS IF NECESSARY)

A. Waste Codes for Federally Regulated Hazardous Wastes. Please list the waste codes of the Federal hazardous wastes handled at your site. List them in the order they are presented in the regulations (e.g., D001, D003, F007, U112). For waste codes see 40 CFR 261.20 - 261.24 or 40 CFR 261.31 - 261.33. Use additional page if more spaces are needed for waste codes.

D001	D002	D003	D005	D006	D008	D009
D012	D013	D014	D016	D018	D020	D022
D031	D032	D038	F002	F003	F005	P004
P008	P030	P037	P039	P041	P044	P050
P051	P059	P066	P070	P071	P088	P089

B. Waste Code for State-Regulated (e.g., non-Federal) Hazardous Waste. List the waste codes of the State-regulated hazardous wastes handled at your site. List them in the order they are presented in the regulations. Use additional page if more spaces are needed for waste codes.

--	--	--	--	--	--	--

IX. NORTH AMERICAN INDUSTRY CLASSIFICATION SYSTEM (NAICS CODE(S))

Visit www.census.gov/eos/www/naics for NAICS code list.

A. 541380	B.	C.	D.
--------------	----	----	----

DESCRIBE PRINCIPAL BUSINESS ACTIVITY

Quality assessment of grain and related commodities; laboratory testing

X. COMMENTS

--

XI. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this and all attached documents, and that based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the submitted information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fines and imprisonment.

SIGNATURE (ORIGINAL INK REQUIRED)

NAME AND OFFICIAL TITLE (TYPE OR PRINT)

DATE SIGNED

Matthew Jung Industrial Hygienist

06/25/2012

NAME OF INSTALLATION

USDA GIPSA TSD

EPA ID

MOD985796762

XII. DESCRIPTION OF REGULATED WASTE CONTINUED (ADDITIONAL SHEET)

B. Listed Hazardous Waste. (See 40 CFR 261.31 - 33. Use this page only if you need to list more waste codes.)

P094

P127

P194

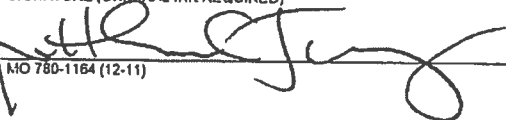
P199

P203

P205

U002

SIGNATURE (ORIGINAL INK REQUIRED)



MO 780-1164 (12-11)

NAME AND OFFICIAL TITLE (TYPE OR PRINT)

Matthew Jung Industrial Hygienist

DATE SIGNED

06/26/2012

U.S. Department of Agriculture
Grain Inspection Packers and
Stockyard Administration
10383 N. Ambassador Dr.
Kansas City, MO 64153-1394

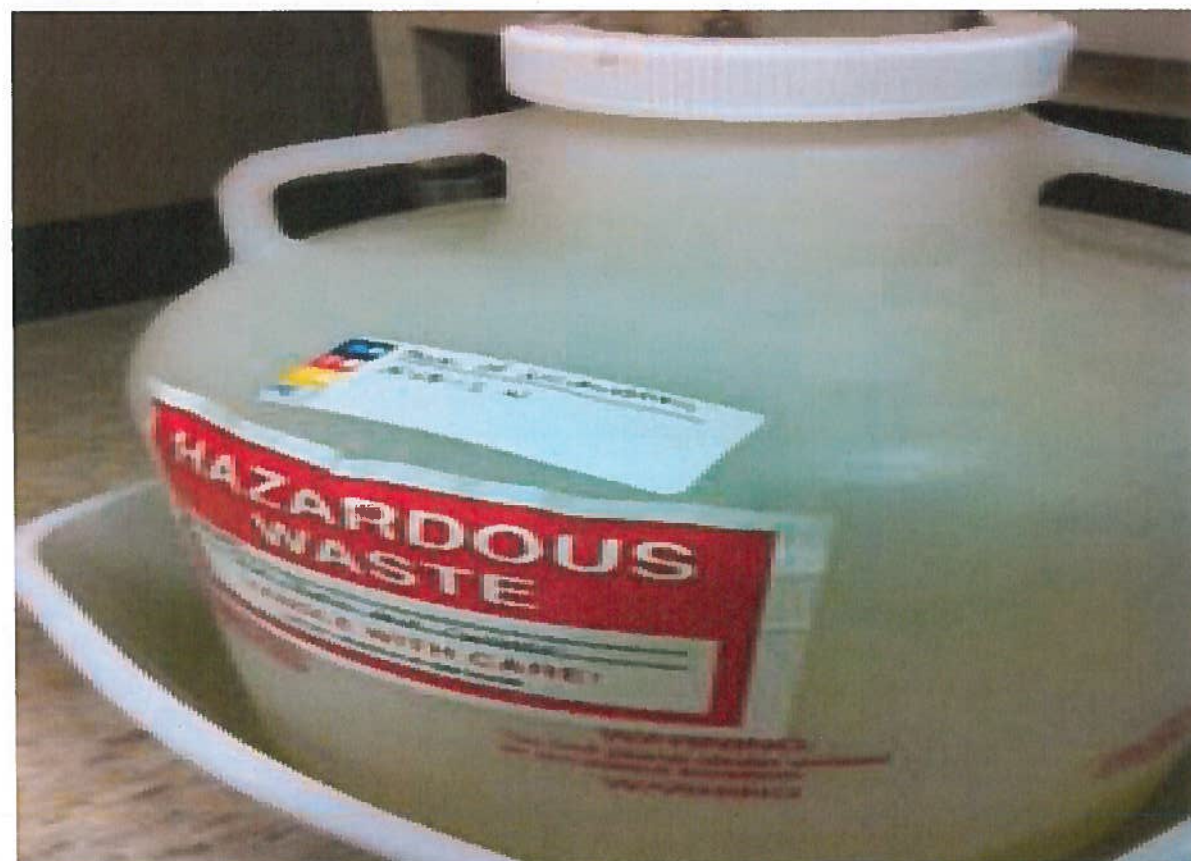
SHIPPED JUN 26 2012

115

HAZARDOUS WASTE PROGRAM
1730 EAST ELM STREET
JEFFERSON CITY, MO
65101-4130



ATTACHMENT E



ATTACHMENT F

Via e-mail

From: Jung, Matthew - GIPSA
Sent: Tuesday, June 26, 2012 2:14 PM
To: 'NorthPatrol@kcpd.org'
Subject: Suspended Federal Protective Services

Hi, we were audited by the EPA last week, and they requested that we contact you to make sure that you could provide interim service to our facility. We anticipate a return to FPS coverage this Fall, but our services with them were suspended due to a lengthy construction process here. In December 2010, I contacted both the local health care providers and the fire department to make sure they could assist us, but at that time, we were served by FPS for police and security issues and so I did not reach out to your organization. Could you please let me know if you are available to help us in an emergency? Please call me is you have any questions. Thank you! Matt

Matthew C. Jung

USDA/GIPSA/TSD

10383 N. Ambassador Drive

Kansas City, MO 64152

(816) 891-0467

Matthew.C.Jung@usda.gov

ATTACHMENT G

Emergency Contacts Telephone Posting

Post this sheet near the telephone(s) in areas where hazardous waste is handled or stored

Company Emergency Coordinator(s)	Work Phone	Pager # or Home Phone
<u>MATT JUNG</u>	<u>(816) 891.0467</u>	<u>(775) 846-9570</u>
_____	_____	_____

Fire Department

Phone 911

Police Department

Phone 911

Hospital

Phone 911

State 24-hour Emergency Response Line

Phone (573) 634-2436

National Response Center (24-hour)

Phone 1-800-424-8802

Location of Emergency Response Equipment

Fire extinguishers

Fire alarm (if present)

Spill control material

Special equipment
(if present)

(Fulfills emergency contact telephone posting requirements for small quantity generators)

FPS : (877) 437-7411



ATTACHMENT H



Office of Fire Marshal

635 Woodland Ave.
Suite 2103
Kansas City, Missouri 64106

Office: 816-784-9100
Pager: 816-864-0833
Fax: 816-784-9130

Larry Mullins
ARTD/RESP
U.S. Environmental Protection Agency
901 N 5th Street
Kansas City, Kansas 66101

Mr. Larry Mullins,

There is a hazardous waste and excess chemical storage building located at the U.S.D.A., Grain Inspection, Packers and Stockyards Administration's Kansas City Technical Center, on 10383 N Ambassador Drive, Kansas City, Missouri, 64153. This building is more than 10 feet from a road or street and conforms to the safety features listed below.

The walls construction is cement cinder blocks covered by a brick outside wall, which have a burn time of at least 4 hours. The door is a steel door with an automatic door closure system and has a fire rating of 2 hours. The building is equipped with an automatic sprinkler system, which links to an alarm system that notifies the Kansas City Fire Department and the Federal Protective Service in the case of a fire.

Together with the above information and a recent inspection of the building on August 24, 2006, I approve of this building being use for the storage of ignitable wastes.

Sincerely,

Phil Pittman

ATTACHMENT H (p2)

Response
to
Report of RCRA Compliance Evaluation Inspection
at
U.S. Department of Agriculture – Federal Grain Inspection
Technical Center
10383 North Ambassador Drive
Kansas City, Missouri 64153

EPA ID Number: MOD985796762
on
November 8-9, 2005

EXCERPT

List of Violations and Responses

NOTE: Ronald Bicsak, Health & Safety Officer responded to all Citations included in this report.

Citation 1: Section 260.390.1(1) RSMO

Stored hazardous waste on-site for over 90-days without a permit.

Note: Contact made with Waste Express, Inc., to remove waste and purchase smaller hazardous waste containers. Lab Safety Supply, Inc. was contacted to purchase labels for hazardous waste receptacles.

Corrective Action

- Attached are copies of the Hazardous Waste Manifests showing that accumulated hazardous wastes were disposed of on November 8-9, 2005. The accumulate wastes were again removed on April 19, 2006, which was in compliance with the storage of hazardous waste without a permit (Attachments A).
- Smaller containers were purchased to accommodate the removal of hazardous waste, especially the pesticide and mycotoxin residue vials, before the 90-day period is exceeded and dates are written on the waste receptacles in the labs and in the storage shed (see photographs, Attachment B).

Citation 2: 10 CSR 25.5.262 (2) 3.B

Failed to update the Notification of Regulated Waste Activity with all waste codes.

Note: Contacted Mr. David Green with the Missouri Department of Natural Resources, Hazardous Waste Program for information concerning the "Notification of Regulated Waste Activity" form.

Corrective Action

- Developed Contingency Plan and submitted to local police, fire, emergency response teams and local hospital, and Federal Protective Service (see Attachments L,M).

Citation 16: 10 CSR 25-5.262 (1) – 40 CFR 265.52(c)

Failed to include in Contingency Plan a list of all emergency equipment at the facility such as fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external) and decontamination equipment.

Corrective Action

- Developed Contingency Plan and submitted to local police, fire, emergency response teams and local hospital, and Federal Protective Service (see Attachments L,N).

Citation 17: 10 CSR 25-16.273(1) – 40 CFR 273.14(d) and 40 CFR 273.15 (c)

Failed to label Universal Waste mercury and document that waste was not stored over one year.

Corrective Action

- Proper labeling has been used and removal of all waste mercury has been completed (See photograph and copy of manifest, Attachment Q)



Citation 18: 10CSR 25-7.265 (2) (I) 7 & 8 – 40 CFR 265.176.

Hazardous Waste less than-90-day storage where ignitable waste is stored is less than 50 feet from the property line.

Note: Contacted Mr. Larry Mullins with US-EPA and Mr. Mike Thomas, GSA Fire Protection Engineer and Ms. Diane Majors, manager with Kessinger-Hunter the leasing agent for the property.

Corrective Action

- It was determined that the building is located less than 50 feet but greater than 10 feet from the property line. A certified engineer has examined the exposing walls of the hazardous waste / ignitable waste storage building.
- The following observations were determined: the building is constructed of 6 inch concrete blocks covered by four inch brick, which according to 2004 Fire Resistance Directory, ANSI/UL 263 (BXUV), Design No. U906, rates this type of material with a 2 hour burn time (See Attachment R).
- The door is a steel door rated 1 ½ hour burn time.
- The door has an automatic door closure device (See Attachment S).
- The building has a automatic sprinkler system installed (See Attachments T).
- The building is equipped with a manual fire extinguisher (See Attachment U).

ATTACHMENT H (p4)

April 26, 2006
MOD981123391

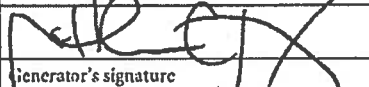
- The building is equipped a heat sensing alarm connected to the Federal Protective Service's alarm center. The main building located within 100 feet of the storage building has standpipe fire hose connections for the fire department.

NOTE: These factors should satisfy the regulations from being within 50 feet from a property line.

Land Disposal Restrictions One-Time Notification/Certification

1. Generator information: Name <u>USDA GIPSA TSD</u> Address <u>10383 N. Ambassador Drive</u> <u>Kansas City, MO 64153</u> EPA ID No. <u>MOD988798762</u>			2. Receiving facility information (if applicable): Name <u>n/a</u> Address _____ EPA ID No. _____ Manifest No. _____		
3. Waste description at point of generation:					
Line Item	Waste description	Hazardous waste code(s)	LDR Subcategory	WW/ HWW	Underlying hazardous constituents [§268.2(f)] ¹
1	acid from Iron analysis on flame AA	D002		WW	none
2					
3					
4					
4. Waste disposition:					
Line Item	Subtitle C exclusion subsequent to point of generation (if applicable)	Current disposition of waste	§268.45, Table 1 technology used to treat debris (if applicable)	Date shipped (if applicable)	
1		DEACT			
2					
3					
4					
5. Was the waste hazardous at the point of generation but subsequently became excluded from the definition of hazardous waste or exempt from Subtitle C regulation (including characteristic wastes managed in wastewater treatment systems discharging under the CWA)? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (If yes, this constitutes the §268.7(a)(7) one-time notification.) ²					
6. Was the waste characteristic at the point of generation, treated onsite to remove all characteristics, and treatment residues then shipped to a Subtitle D land disposal facility? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (If yes, complete Certification 1, 2, or 3.) ³					
7. Was the waste "debris" that was hazardous at the point of generation but subsequently became excluded from the definition of hazardous waste under §261.3(f)(1) by treating it using an extraction or destruction technology in §268.45, Table 1? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (If yes, complete Certification 4.) ³					
8. Was the waste "debris" that was hazardous at the point of generation but subsequently became excluded from the definition of hazardous waste under §261.3(f)(2) by receiving a "no-longer-contains" determination from EPA or the authorized state? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (If yes, this constitutes the §268.7(d)(1) one-time notification.) ⁴					
9. Was the waste "soil" that was hazardous at the point of generation but subsequently became excluded from the definition of hazardous waste via a "no-longer-contains" determination from EPA or the authorized state or by the generator determining that the soil no longer exhibits a characteristic? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (If yes, this constitutes the §268.7(e)(1) one-time notification.) ⁵					
10. Is the waste residue from treating K061, K062, and/or F006 wastes in high-temperature metals recovery (HTRM) units that 1) meets the generic exclusion levels in §261.3(c)(2)(i)(C), 2) does not exhibit any characteristics, and 3) is shipped to a Subtitle D land disposal facility? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (If yes, complete Certification 5.) ⁶					

Land Disposal Restrictions One-Time Notification/Certification (Continued)

<p><input checked="" type="checkbox"/> Waste that has been treated to remove characteristics and that did not contain underlying hazardous constituents at the point of generation.</p> <p>I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification. Based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to comply with the treatment standards specified in 40 CFR 268.40 without impermissible dilution of the prohibited waste. I am aware there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment.</p>	<p>Applies to manifest line items: _____</p> <p>Reference: §§268.7(b)(4) and 268.9(d) 268.7(a)7</p>	
<p><input type="checkbox"/> Waste that has been treated to remove characteristics and to meet universal treatment standards for underlying hazardous constituents.</p> <p>I certify under penalty of law that the waste has been treated in accordance with the requirements of 40 CFR 268.40 to remove the hazardous characteristic and that underlying hazardous constituents, as defined in §268.2(i) have been treated on-site to meet the §268.48 Universal Treatment Standards. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment.</p>	<p>Applies to manifest line items: _____</p> <p>Reference: §§268.7(b)(4)(v) and 268.9(d)</p>	
<p><input type="checkbox"/> Waste that has been treated to remove characteristics but does not meet universal treatment standards for underlying hazardous constituents.</p> <p>I certify under penalty of law that the waste has been treated in accordance with the requirements of 40 CFR 268.40 or 268.49 to remove the hazardous characteristic. This decharacterized waste contains underlying hazardous constituents that require further treatment to meet treatment standards. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment.</p>	<p>Applies to manifest line items: _____</p> <p>Reference: §§268.7(b)(4)(iv) and 268.9(d)</p>	
<p><input type="checkbox"/> Debris that has been treated to meet the alternative treatment standards.</p> <p>I certify under penalty of law that the debris has been treated in accordance with the requirements of 40 CFR 268.45. I am aware there are significant penalties for making a false certification, including the possibility of fine and imprisonment.</p>	<p>Applies to manifest line items: _____</p> <p>Reference: §268.7(d)(3)(iii)</p>	
<p><input type="checkbox"/> HTMR residue from treating K061, K062, and/or F006 wastes.</p> <p>I certify under penalty of law that the generic exclusion levels for all constituents have been met without impermissible dilution and that no characteristic of hazardous waste is exhibited. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment.</p>	<p>Applies to manifest line items: _____</p> <p>Reference: §261.3(c)(2)(ii)(C)</p>	
<p></p>	<p>Matthew Jung Industrial Hygienist</p>	<p>06/26/2012</p>
<p>Generator's signature</p>	<p>Printed/typed name & title</p>	<p>Date</p>

1 Use an attachment if necessary. If all underlying hazardous constituents will be treated and monitored, there is no requirement to list any on this notification.

2 This one-time notification is placed in the facility's onsite files only. For compliance with the §268.9(d) one-time notification and certification, if the waste does not meet universal treatment standards for underlying hazardous constituents (i.e., Certification 3 above), the generator must somehow communicate the need for UHC treatment to the Subtitle D facility; the notification and certification must be updated if the process or operation generating the waste changes and/or if the Subtitle D receiving facility changes.

3 This one-time notification must be sent to EPA or the authorized state and placed in the facility's files. It is not sent with the shipment to the Subtitle D receiving facility. The notification must be updated if 1) a different type of debris is treated, 2) a different §268.45, Table 1 technology is used to treat the debris, and/or 3) the Subtitle D receiving facility changes. The certification (Certification 4 above) must be placed in the facility's files for each shipment of treated debris.

4 This one-time notification must be sent to EPA or the authorized state and placed in the facility's files. It is not sent with the shipment to the Subtitle D receiving facility. The notification must be updated if the Subtitle D receiving facility changes.

5 This one-time notification and certification must be sent to EPA or the authorized state and placed in the facility's files. It is not sent with the shipment to the Subtitle D receiving facility. The notification and certification must be updated if the process or operation generating the waste changes and/or if the Subtitle D receiving facility changes.

Source: McCoy and Associates, Inc.

ATTACHMENT 5

USDA GIPSA TSD

Basic Hazardous Waste Training Record

Material Covered

1. Workgroup Waste Streams
2. Sattelite Accumulation Area/Point Operation
3. Accumulation Area (Chemical Storage Shed) Operation
4. Emergency Preparedness and Response
5. References: Chemical Hygiene Plan SAFE 01 - SAFE 06

Workgroup/Employee	Training Completed	Comments
Trace Analysis Workgroup		
Barney, Josheph	8/3/2010	
Ghosh, Ajit	8/3/2010	
Vanfossan, Jason	8/3/2010	
Vanfossan, Jeff	8/3/2010	
Nielsen, Joanne	8/3/2010	
Norden, Tim	8/3/2010	
Hinshaw, Gary	8/3/2010	
He, Xiaodun	8/3/2010	
Mani, Ramaswamy	8/3/2010	
Weber, Tom	8/3/2010	
Lynn Poston's Workgroup		
Asfaw, Sossina	8/4/2010	Presentation 8/4/10; referred group to become familiar with Chemical Hygiene Supervisors responsible for ensuring employees familiar with Chemical Hygiene
Curry, Gertrude	8/4/2010	
Evans, Brenda	8/4/2010	
Johnson, April	8/4/2010	
Morris, Dave	8/4/2010	
Murthy, Ganga	8/4/2010	
Nelson, Daishia	8/4/2010	
Polyston, Lynn	8/4/2010	
Terril, Glen	8/4/2010	
Tone-Pah-Hote, Justin	8/4/2010	
Biotech Workgroup		
Jenkins, Ron	8/5/2010	Presentation 8/5/10; referred group to become familiar with Chemical Hygiene Supervisors responsible for ensuring employees familiar with Chemical Hygiene
Wacker, Paul,	8/5/2010	
Hilber, Jennifer	8/5/2010	
Scholberg, Tandace	8/5/2010	

ATTACHMENT J (EXAMPLE)

Users

Search | Help |

> Search > Search Results > Edit Learning History

User ID: [REDACTED]

Name: [REDACTED]

Surveys	Skills Inventory				Standard Options
Organization Dashboard	Organization Initiatives	Succession Planning	Alternate Job Positions	Performance Review	SF-182 Requests
Commerce	Account Code	Catalog Preview	Preferences	Approval Role	Approvals
Cpty Profiles	Competencies	Registration	Requests	Online Status	Assessments
Summary	Phone Numbers	Custom Fields	To Do List	Completed Work	Curricula

View the Learning History for the User

Sort By: **Completion Date** [icon]

Item Title	Status	Completion Date	Details
Web Based OCFO-TravelCard (Rev 1 - 3/2/2010 10:24 AM America/New York)	Web Based Complete	5/21/2012 12:18 PM America/New York	View Details Object Details
USDA Travel Card Training			
Web Based DA-ETHICS-OUTSIDEEMP (Rev 12/30/2011 03:00 PM America/New York)	Web Based Complete	2/23/2012 03:43 PM America/New York	View Details Object Details
Ethics: Outside Employment			
Web Based DA-ETHICS-POLACTIVITY (Rev 12/30/2011 03:00 PM America/New York)	Web Based Complete	2/23/2012 03:12 PM America/New York	View Details Object Details
Ethics: Political Activity			
Web Based DA-ETHICS-TEACHING (Rev 12/30/2011 03:00 PM America/New York)	Web Based Complete	2/23/2012 02:57 PM America/New York	View Details Object Details
Ethics: Teaching, Speaking, Writing			
Web Based USDA-ISA-FY2012 (Rev 1 - 9/27/2011 11:42 AM America/New York)	Web Based Complete	2/23/2012 02:37 PM America/New York	View Details Object Details
FY2012 USDA Information Security Awareness Training			
Web Based USDA-ISA-FY2012-PRETEST (Rev 1 - 9/28/2011 04:10 PM America/New York)	Web Based Complete	2/23/2012 02:37 PM America/New York	View Details Object Details
FY2012 USDA Information Security Awareness Training Pre-Test			
		1/12/2012 01:30 PM America/New York	View Details
Martin Luther King, Jr., Birthday Celebration & Training Luncheon			
Web Based GIPSA-CulturalTransformTrain (Rev 1 - 11/29/2011 10:59 AM America/New York)	Web Based Complete	12/27/2011 10:30 AM America/New York	View Details Object Details
GIPSA Cultural Transformation Training			

Web Based GIPSA-CulturalTransformTrain (Rev 1 - 11/29/2011 10:59 AM America/New York)	Web Based Complete	12/15/2011 02:23 PM America/New York	View Details Object Details
GIPSA Cultural Transformation Training			
Web Based USDA-NoFearAct-2011-Refresher (Rev 1 - 7/19/2011 10:02 AM America/New York)	Web Based Complete	11/22/2011 02:42 PM America/New York	View Details Object Details
No FEAR 2011 Refresher Training			
		8/26/2011 12:30 PM America/New York	View Details
Equality Day			
Request ID: [REDACTED]		7/13/2011 01:00 AM America/New York	View Details
Quattro Micro Operation Training			
Web Based DA-ETHICS-INVITATIONS (Rev 2011 - 2/1/2011 06:00 AM America/New York)	Web Based Complete	6/29/2011 06:47 PM America/New York	View Details Object Details
Ethics: Invitations from Outside Entitles			
Web Based DA-ETHICS-GIFTSOUTSIDESOURCES (Rev 2011 - 2/1/2011 06:00 AM America/New York)	Web Based Complete	6/29/2011 06:37 PM America/New York	View Details Object Details
Ethics: Gifts from Outside Sources			
Web Based DA-ETHICS-CONFLICTING (Rev 2011 - 2/1/2011 06:00 AM America/New York)	Web Based Complete	6/29/2011 06:10 PM America/New York	View Details Object Details
Ethics: Conflicting Interests			
		6/23/2011 05:00 PM America/New York	View Details
Early Federal Career Financial Benefits Workshop			
Web Based USDA-NARA-01 (Rev 1 - 10/1/2010 09:00 AM America/New York)	Web Based Complete	4/15/2011 05:07 PM America/New York	View Details Object Details
NARA Records Management for Everyone			
Web Based USDA-NOFEARACT-2010 (Rev 1 - 1/22/2010 12:55 PM America/New York)	Web Based Complete	2/23/2011 11:39 AM America/New York	View Details Object Details
USDA No FEAR Act Training 2010			
Classroom GIPSA-FGIS-HARRASSMENT (Rev 1 - 2/15/2011 02:21 PM America/New York)	Class Completed	2/8/2011 04:00 PM America/New York	View Details
Sexual Harrassment			
Web Based USDA-CYBERSECURITY-FY2011 (Rev 10/1/2010 06:00 AM America/New York)	Web Based Complete	1/28/2011 10:45 AM America/New York	View Details Object Details
FY2011 USDA Information Security Awareness and Rules of Behavior Training			
Web Based USDA-NINTH-HOUSE-480 (Rev 1/7/2009 12:00 AM America/New York)	Web Based Complete	12/30/2010 03:09 PM America/New York	View Details Object Details
10 steps to getting organized			
Web Based DA-ETHICS-GIFTSOUTSIDESOURCES (Rev 12/16/2004 08:50 AM America/New York)	Web Based Complete	11/17/2010 06:47 PM America/New York	View Details Object

Ethics: Gifts from Outside Sources		York	Details
Web Based DA-ETHICS-POLACTIVITY (Rev 12/10/2004 03:44 PM America/New York)	Web Based Complete	11/15/2010 01:07 PM America/New York	View Details Object Details
Ethics: Political Activity		8/26/2010 01:30 PM America/New York	View Details
Equality Day Lunch and Learn			
Web Based SAH0436_SKILLSOFT (Rev 5/1/2006 01:11 AM America/New York)	Web Based Complete	4/14/2010 04:21 PM America/New York	View Details Object Details
Hazard Communication (HAZWOPER)			
Web Based DA-ETHICS-EMPRESTRICTIONS (Rev 12/10/2004 03:43 PM America/New York)	Web Based Complete	1/28/2010 03:05 PM America/New York	View Details Object Details
Ethics: Basic Post-Employment Restrictions			
Web Based USDA-CYBERSECURITY-FY10 (Rev 9/24/2009 11:36 AM America/New York)	Web Based Complete	1/15/2010 04:38 PM America/New York	View Details Object Details
FY2010 USDA Information Security Awareness and Rules of Behavior Training			
Web Based DA-ETHICS-ACCEPTANCE (Rev 12/10/2004 03:40 PM America/New York)	Web Based Complete	12/22/2009 12:10 PM America/New York	View Details Object Details
Ethics: Acceptance of Payment from a Non-Federal Source for Travel Expenses			
Web Based DA-ETHICS-EMPRESTRICTIONS (Rev 12/10/2004 03:43 PM America/New York)	Web Based Complete	12/22/2009 11:59 AM America/New York	View Details Object Details
Ethics: Basic Post-Employment Restrictions			
Web Based DA-ETHICS-FINDISCLOSURE (Rev 12/10/2004 03:44 PM America/New York)	Web Based Complete	12/22/2009 11:35 AM America/New York	View Details Object Details
Ethics: Financial Disclosure			
Classroom GIPSA-CIVILRIGHTS-2009-10 (Rev 1 - 12/11/2009 04:18 PM America/New York)	Class Completed	12/8/2009 02:23 PM America/New York	View Details
EEO-Civil Rights for FGIS Employees			
Web Based SAH0456_SKILLSOFT (Rev 5/1/2006 11:05 PM America/New York)	Web Based Complete	10/14/2009 06:11 PM America/New York	View Details Object Details
Material Safety Data Sheets		9/26/2009 01:30 PM America/New York	View Details
Equality Day Lunch and Learn			
Web Based GIPSA-PerfMgmt-03 (Rev 1 - 4/3/2009 12:59 PM America/New York)	Web Based Complete	8/12/2009 03:51 PM America/New York	View Details Object Details
Managing Performance in Marketing and Regulatory Programs (Employee)		8/11/2009 03:00 PM America/New York	View Details

Seminar on US Grain Standards Act

Web Based USDA-NOFEARACT-Refresher (Rev 4/20/2009 11:00 AM America/New York)	Web Based Complete	6/2/2009 10:58 AM America/New York	View Details Object Details
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NO FEAR Act Refresher Training

Web Based USDA-ASCR-2008-Diversity-Emp (Rev 1 - 10/30/2008 02:48 PM America/New York)	Web Based Complete	11/5/2008 01:00 PM America/New York	View Details Object Details
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Re-inventing Diversity for Today's USDA (Employees)

Web Based DA-ETHICS-PRPTIME (Rev 12/10/2004 03:58 PM America/New York)	Web Based Complete	10/16/2008 03:19 PM America/New York	View Details Object Details
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Ethics: Using Government Property and Time

Web Based DA-ETHICS-FUND (Rev 12/10/2004 03:46 PM America/New York)	Web Based Complete	10/16/2008 03:05 PM America/New York	View Details Object Details
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Ethics: Fundraising

Web Based DA-ETHICS-CONFLICTING (Rev 12/10/2004 03:41 PM America/New York)	Web Based Complete	10/15/2008 03:16 PM America/New York	View Details Object Details
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Ethics: Conflicting Interests

Web Based USDA-CYBERSECURITY-FY09 (Rev 8/1/2008 06:55 PM America/New York)	Web Based Complete	10/7/2008 03:39 PM America/New York	View Details Object Details
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USDA Information Systems Security Awareness FY 2009

Web Based DA-ETHICS-ORIENTATION (Rev 2/3/2006 01:26 PM America/New York)	Web Based Complete	10/2/2008 04:35 PM America/New York	View Details Object Details
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Ethics: Training Module 21 New Employee Ethics Orientation